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MAY 15 2023  
U.S. District Court  
Middle District of TN

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

DARRELL HOWARD,

Plaintiff,

Vs.

JOHN DOE, in his individual capacity,  
ALIAS HAAGENSON, in his individual  
capacity,  
WARDEN F/N/U NORMAN  
WARDEN BRANDON WATWOOD,  
In their official capacity,  
CORE-CIVIC, inc,  
Defendant.

CASE No. \_\_\_\_\_

JURY TRIAL DEMAND,

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS  
UNDER 42 U.S.C. § 1983

I. PREVIOUS LAWSUITS:

A. Have you begun any other lawsuit in either state or Federal court dealing with  
the same facts involved in this action or otherwise relating to your  
imprisonment? YES \_\_\_\_\_ NO X \_\_\_\_\_

B. If your answer to A is YES, describe the lawsuit in the space below.

1. Parties to the previous lawsuit:

Plaintiffs: \_\_\_\_\_ N/A \_\_\_\_\_

Defendants: \_\_\_\_\_ N/A \_\_\_\_\_

2. COURT: N/A

3. Docket Number: N/A

4. Name of Judge to whom case was assigned: N/A

5. Disposition: (dismissed – appealed – pending) N/A

6. Approximate date of filing lawsuit: N/A

7. Approximate date of disposition: N/A

II. PLACE OF PRESENT CONFINEMENT: Tennessee Department of Corrections  
at Turney Center Industrial Complex, 1499 Moore Memorial Highway, P. O. Box  
4050, Only, Tennessee 37140-4050

A. Is there a prisoner grievance procedure in this institution?

YES X NO       

B. Did you present the facts relating to your complaint in the state prisoner  
grievance procedure? YES X NO       

C. If your answer is Yes,

1. What steps did you take? I filed a grievance regarding the  
incident.

2. What was the result? It was never returned to me and TDOC has  
no record of my filing a grievance. I can not satisfy administrative  
remedies if the prison loses the paperwork.

(Attach copy from each stage which shows results of grievance.)

D. If your answer to B is No, explain why not: N/A

E. If there is no prisoner grievance procedure in the institution, did you complain  
to the prison authorities? YES            NO           

F. If your answer is YES,

1. What steps did you take? N/A

2. What was the result? N/A

### III. PARTIES:

A. Name of Plaintiff: Darrell Howard, inmate # 273024

Present Address: 1499 R.W. Moore Memorial Hwy. P. O. Box 4050 Only,  
Tennessee 37140-4050

Permanent home address: N/A

B. Defendant: John Doe

Official position: Correctional Officer at Trousdale Turner Correctional  
Complex

Address of place of employment: Trousdale Turner Correction 140 Macon  
way, Hartsville TN 37074

C. Additional Defendants: Alias Haagenson, Brandon Watwood, f/n/u Norman  
Core-Civic Inc.

STATEMENT OF THE CLAIM(S):

**I. GENERAL CLAIMS:**

1. The deliberate indifference exhibited by each of the defendants lead to me being assaulted and hospitalized.

**COUNT ONE (DEFENDANT CORE-CIVIC)**

2. In October of 2022 I was moved from AA pod to AD pod to be a rock man<sup>1</sup> for DA the segregation unit.

3. I was told that in order to be a rock man they had to put me in the computer as having refused cell.

4. After approximately two (2) weeks, during an audit by TDOC, the auditor John Walton, told me I was not supposed to be living in segregation unless I was in protective custody or punitive segregation.

5. Because punitive segregation can not be rock men I told I would be placed on protective custody.

6. Shortly after this Lieutenant McDavid informed me that per Wardens Brandon Watwood F/N/U Norman our status had to be changed to pending transfer in order for me to continue working in segregation.

7. Over the course of three (3) months my status was changed at the direction of Wardens Brandon Watwood F/N/U Norman four (4) times so that I could work as a rock man in the segregation unit,

8. It is my firm belief that all of this changing of my status was an attempt by Core-Civic, by and thru Wardens Brandon Watwood F/N/U Norman to place me in a cell location that I was not supposed to be in so they could work me as a rock man.

9. It is my firm belief that my placement in the segregation unit lead to my being assaulted.

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<sup>1</sup> A rock man performs janitorial duties and assists staff with tasks such as feeding the segregated inmates.

## **COUNT TWO (DEFENDANTS JOHN DOE AND ALIAS HAAGENSON)**

10. On 2/11/2023 at approximately 1834, while I was asleep, Four (4) close custody Inmates, Sidarious Jackson; Demarcus Johnson; Brian Kinsey; and Bradley Robinson, from Alpha Ehco, were allowed to leave there unit by CO John Doe, and were allowed to come to alpha Delta, the adjacent pod, which housed me and my cellmate Jacob Tate.

11. While I was asleep I was assaulted by these four inmates. I was stabbed thirteen (13) times, my left thumb was cut off, I was severely beaten, and the cord from my lamp was used to strangle me.

12. After thirty approximately (30) minutes of this I was finally taken out of my cell and one of my assailants notified a CO that they were done.

13. Approximately ten (10) minuets after that I was sent to medical and then hospitalized.

14. I was at Skyline Medical Center from 2/11/2023 to 2/15/2023 four (4) days.

15. After I was released from Skyline Medical Center, I was returned to Trousdale Turner Correction Center.

16. After I returned Lieutenant McDavid allowed me to review the camera footage of the incident.

17. CO Bird at breakfast, approximately 4 AM, on 2/11/2023 opened the door of AE 204 to allow inmates to set out a cooler, it is my firm belief that this was a violation of policy.

18. The camera shows these inmates jam their door at this time.

19. At evening chow the same day approximately 1730 CO John Doe opens the pass door connecting our two pods, allowing these inmates access to AD pod

20. At approximately 1830 CO John Doe opens my door and moments later the inmates who assaulted me entered my cell.

21. During this time CO John Doe and inmate Zackary Allen were serving chow in the pod.

22. Inmate Zachary Allen informed CO John Doe that I was being assaulted and CO John Doe elected not to respond.

23. CO John Doe then leaves the pod, walking past my cell, while these four (4) inmates were in my cell stabbing me.

24. After CO John Doe left the pod inmate Zachary Allen informed CO Alias Haagenson what was happening and he also failed to respond.

25. Approximately thirty (30) minuets after the assault began I was taken, by my assailants, into the pod where they beat on the pod door and one of the inmate workers had to tell the CO to call a Code.

26. Approximately ten (10) minuets after that I was sent to medical.

IV. RELIEF REQUESTED:

A. I ask the Court to hold John Doe personally responsible for his deliberate indifference leading, to and during, me being attacked.

B. I ask the Court to Hold Alias Haagenson personally responsible for his deliberate indifference during my attack.

C. I ask the Court to hold Core-Civic, and it's employees Warden F/N/U Norman and Warden Brandon Watwood responsible for their deliberate indifference which lead to me being attacked.

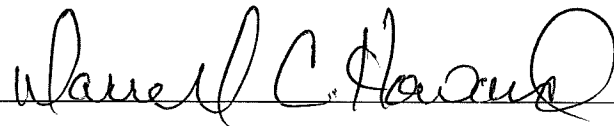
D. I am asking for Economic Damages in the amount of three hundred Dollars and fifty-five cent (\$372.55) for property lost as a result of defendants actions

E. 50,000 in Future damages for physical and psychological therapy arising out of this incident from each defendant

- F. 100,000 In compensatory damages for physical injuries and solatium from each defendant.
- G. Punitive Damages in the amount of 50,000 against CO John Doe
- H. Punitive Damages in the amount of 25,000 against CO Alias Haagenson
- I. Punitive Damages in the amount of 25,000 against Warden F/N/U Norman
- J. Punitive Damages in the amount of 25,000 against Warden Brandon Watwood
- K. Punitive damages in the amount of 2,000,000 against Core-Civic
- L. That upon Prevailing in this action that Plaintiff be awarded cost associated with the commencement of this action
- M. And for any such further relief this Court deems just and proper.

I do hereby certify under penalty of perjury that the above complaint is true and accurate to the best of my knowledge, information, memory, and belief.

Signed this the 9<sup>th</sup> day of May, 2023.

Signature: 

TDOC No.: #273024

Address: 1499 R.W. Moore Memorial Hwy.  
P. O. Box 4050  
Only, Tennessee 37140-4050

Darrell Howard

# 273024

1499 R.W. Moore Memorial Hwy.

P. O. Box 4050

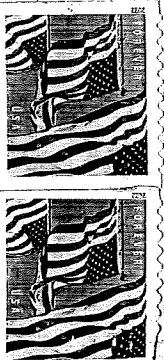
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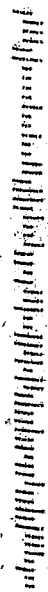
Clerk of Court

801 Broadway Room 800

U.S. Courthouse

Nashville TN 37203

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The Department of Corrections  
has neither inspected  
nor censored and is not  
responsible for the contents  
Turney Center Industrial Complex